

IN THE UNITED STATES OF AMERICA
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED:
v.	:	CRIMINAL NO.:_____
MARILYN TYLER	:	VIOLATIONS: 18 U.S.C. § 1343 (wire fraud- 4 counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times relevant to this indictment:
 - a. Fraser Williams America (“Fraser Williams”) was a subsidiary of Fraser Williams Commercial System, a United Kingdom based corporation.
 - b. Fraser Williams was a company that developed and implemented software for managing commercial real estate.
 - c. Fraser Williams had an office in Pennsylvania, at which the company employed staff which included defendant MARILYN TYLER. Defendant TYLER also worked for Fraser Williams out of her home, in Pennsylvania.
 - d. Defendant MARILYN TYLER held the position of financial controller for Fraser Williams. Her duties and responsibilities included managing company funds and making payments on behalf of Fraser Williams. These included payments to the Internal Revenue Service and to Manulife Financial, the pension plan for Fraser Williams.

2. From on or about January 2, 2003, to on or about July 3, 2006, defendant

MARILYN TYLER

devised and intended to devise a scheme to defraud Fraser Williams and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

It was part of the scheme that:

3. Defendant MARILYN TYLER wire transferred money to D.I., an individual known to the grand jury and defendant TYLER, from the accounts of Fraser Williams without the knowledge and permission of Fraser Williams.

4. Defendant MARILYN TYLER owned property in the United Kingdom with D.I. on which there was an outstanding mortgage. Defendant TYLER sent wire transfers to D.I. as payments for defendant TYLER'S portion of the outstanding mortgage.

5. Defendant MARILYN TYLER also wire transferred money to her bank account at National Westminster, without the knowledge and permission of Fraser Williams. The wire transfers were used to cover various expenses that defendant TYLER had incurred.

6. Defendant MARILYN TYLER covered up the wire transfers of money to D.I. and to her bank account at National Westminster by falsely recording the wire transfers as payments to the Internal Revenue Service or the company's pension plan with Manulife Financial. Defendant TYLER recorded these payments because she believed that the Internal Revenue Service and pension plan were the least likely to be uncovered on a timely basis. In that way, Defendant TYLER could try to pay back the money that she had taken without permission.

7. Between on or about January 2, 2003 and on or about July 3, 2006, in the Eastern District of Pennsylvania and elsewhere, defendant

MARILYN TYLER,

for the purpose of executing the scheme described above, wire transferred or caused to be wire transferred, approximately \$92,724.23, which included the following wire transfers:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
One	12/4/03	\$ 891.47 wire transfer to D. I.
Two	12/2/04	\$ 999.42 wire transfer to D. I.
Three	12/14/05	\$ 917.61 wire transfer to D. I.
Four	7/3/06	\$1,908.33 wire transfer to D. I.

All in violation of Title 18, United States Code, Section 1343.

PATRICK L. MEEHAN
United States Attorney